UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re	:	**Chapter 11**
KABBAGE, INC. d/b/a KSERVICING, *et al.*,	:	**Case No. 22-10951 (CTG)**
Debtors.[1]	:	**(Jointly Administered)**
	:	**Re: Docket No. 95**

CERTIFICATION OF COUNSEL REGARDING ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS

The undersigned hereby certifies as follows:

1. On October 11, 2022, Kabbage, Inc. d/b/a KServicing and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "**Debtors**"), filed the *Motion of Debtors for Entry of Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 95] (the "**Motion**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**"). A proposed form of order granting the relief requested in the Motion was attached to the Motion as **Exhibit A** (the "**Proposed Order**").

2. Pursuant to the *Notice of Motion and Hearing* filed with the Motion, objections or responses to the relief requested in the Motion, if any, must be made in writing and

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable are: Kabbage, Inc. d/b/a KServicing (3937); Kabbage Canada Holdings, LLC (N/A); Kabbage Asset Securitization LLC (N/A); Kabbage Asset Funding 2017-A LLC (4803); Kabbage Asset Funding 2019-A LLC (8973); and Kabbage Diameter, LLC (N/A). Kabbage is a trademark of American Express used under license; Kabbage, Inc. d/b/a KServicing is not affiliated with American Express. The Debtors' mailing and service address is 925B Peachtree Street NE, Suite 383, Atlanta, GA 30309.

filed with the Court on or before October 19, 2022 at 4:00 p.m. (prevailing Eastern Time) (the "**Objection Deadline**").

3. Prior to the Objection Deadline, the Debtors received certain informal comments (the "**Comments**") to the relief requested in the Motion from the Office of the United States Trustee for the District of Delaware (the "**U.S. Trustee**").

4. To resolve the Comments, the Debtors have prepared a revised form of Proposed Order (the "**Revised Order**"), attached hereto as **Exhibit 1**. The Revised Order has been circulated to the U.S. Trustee and the Federal Reserve Bank of San Francisco, and the aforementioned parties do not object to the entry of the Revised Order. For the convenience of the Court and all parties in interest, a redline comparison of the Revised Order marked against the Proposed Order is attached hereto as **Exhibit 2**.

[*Remainder of page intentionally left blank*]

WHEREFORE the Debtors respectfully request that the Revised Order be entered at the earliest convenience of the Court.

Dated: October 20, 2022
Wilmington, Delaware

/s/ Amanda R. Steele

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